

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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PETER GROOME,
Petitioner
v.
TIMOTHY HALL,
Respondent.

Civil Action No: 03-12397-PBS

The Petitioner's Motion to File A Memorandum In Excess of Twenty Pages

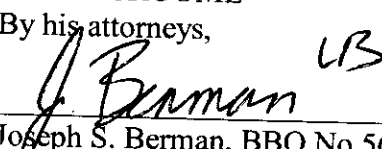
The petitioner respectfully requests that he be permitted to file a brief in excess of twenty (20) pages. See Local R. 3.01. As reasons for his request, the petitioner states that this case involves a petition for a writ of habeas corpus and raises several constitutional issues. The brief that is the subject of this motion is actually a combination of two briefs- a brief in support of his petition and in opposition to the respondent's motion to dismiss. This is the petitioner's first application for a writ of habeas corpus. The petitioner states that in order to adequately address the issues presented he must file a brief in excess of twenty pages, approximately 45 pages. Allowance of this motion is necessary to protect the petitioner's constitutional and statutory rights.

For the foregoing reasons, the petitioner respectfully requests that he be permitted to file a memorandum in excess of twenty pages.

Respectfully submitted,

PETER GROOME

By his attorneys,

 ^{LB}

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Dated: February 19, 2004

CERTIFICATE OF SERVICE

I, Elizabeth L. Bostwick, Esq., hereby certify that on this 19th day of February, 2004 I served a copy of the foregoing by first class mail, postage prepaid to: Maura D. McLaughlin, Assistant Attorney General, Criminal Bureau, One Ashburton Place, Boston, MA 02108.



Elizabeth L. Bostwick